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Attorneys for USACM Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

USA Commercial Mortgage Company,
Debtors.

Case No. BK-S-06-10725-LBR

CHAPTER 11

**Stipulation re Proofs of Claim Filed by
Ovca Associates, Inc. Defined Pension
Plan**

Date of Hearing: September 30, 2011

Time of Hearing: 9:30 a.m.

USACM Liquidating Trust (the "USACM Trust"), by and through its counsel, Lewis and Roca LLP, and Ovca Associates, Inc. Defined Pension Plan. ("Ovca"), by and through its Trustee William J. Ovca, Jr., represent to the Court as follows:

The total amount of Claim 10725-01754, filed by Ovca that remains unresolved is \$150,000. The claim is based upon investments in three loans that are now the subject of omnibus objections to the allowance of claims by the USACM Trust:

Loan Name	Amount of Investment
HFAH Clear Lake	\$50,000.00
Bundy Canyon \$5,725,000.00	\$50,000.00
Fox Hill 216	\$50,000.00

The objections now at issue with regard to the Ovca claims are the Tenth Omnibus Objection re Fox Hills 216, LLC Loan [DE 8621] and Ovca's Response to the Objection [DE 8937], the Seventh Omnibus Objection re HFAH Clear Lake [DE 8897] and Ovca's

Response to the Objection [DE 9137], the Second Omnibus Objection of USACM Trust to the Bundy Canyon (\$5.725 Million) Loan [DE 8734] and Ovca's Response to the Objection [DE 8937].

The Fox Hills 216, LLC Objection is currently on the Court's calendar for September 30, 2011 as item No. 53. The Bundy Canyon Objection is currently on the Court's calendar for September 30, 2011 as item No. 11. The HFAH Objection is currently on the Court's calendar for September 30, 2011 as item No. 53. The parties wish to continue these hearings to December 19, 2011 at 9:30 a.m..

The parties request the proceedings related to the three objections to which Ovca has responded be consolidated and scheduled for a single hearing on December 19, 2011 at 9:30 a.m., which is an omnibus hearing date. The Ovca's are out of the country and therefore unavailable for the hearing on November 15, 2011.

In the interim, the parties will attempt to negotiate a settlement and, if necessary, proceed to mediation.

LEWIS AND ROCA LLP

William J. Ovca, Jr.

By s/ John Hinderaker
Robert M. Charles Jr. NV (#6593)
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s/ William J. Ovca, Jr.
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Dated: September 29, 2011

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